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Attorneys for Plaintiff/Counterdefendant  
SYNOPSYS, INC.

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SYNOPSYS, INC.,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., UBIQUITI  
NETWORKS INTERNATIONAL LIMITED,  
CHING-HAN TSAI, and DOES 1-20,  
inclusive,

Defendants.

UBIQUITI NETWORKS, INC.

Counterclaimant,

v.

SYNOPSYS, INC.,

Counterdefendant.

Case No. 3:17-cv-00561-WHO (LB)

**SUPPLEMENTAL DECLARATION  
OF DENISE M. MINGRONE IN  
SUPPORT OF SYNOPSYS' MOTION  
TO EXTEND TIME FOR CASE  
MANAGEMENT CONFERENCE**

Dept. Courtroom 2, 17th Floor  
Judge: Hon. William H. Orrick

1 I, Denise M. Mingrone, declare as follows:

2 1. I am a member of the California State Bar, admitted to practice before this Court,  
3 and am a partner in the law firm of Orrick, Herrington & Sutcliffe LLP, counsel of record for  
4 Plaintiff Synopsys, Inc. (“Synopsys”) in this matter. I have personal knowledge of the facts  
5 stated in this declaration. I could and would testify competently to the matters stated herein.

6 2. On Friday afternoon July 13, the day after Synopsys filed its motion,  
7 Ubiquiti/UNIL informed me that they had reconsidered and were “willing to do a mediation with  
8 Judge Phillips or Judge Feess prior to the end of July.” *See* Ex. C at 2-3 (7/13/2018 email from J.  
9 Taylor). Specifically, however, Defendants demanded that Synopsys mediate with Judge Gary  
10 Feess (not Judge Phillips as ordered by the Court) and only on July 19 or 23. *Id.* I reminded  
11 counsel that the parties currently have depositions scheduled for July 18, 19, 24, 25, and 27 and  
12 need to prepare for said depositions, but I nevertheless agreed to ask Synopsys about its  
13 availability to mediate on those two dates. *Id.* at 1 (7/13/2018 email from D. Mingrone).

14 3. After determining Synopsys could not accommodate either date based on such late  
15 notice and pre-planned travel, on Sunday, July 15, I informed Ubiquiti/UNIL that Synopsys was  
16 not available to attend a mediation on either date. *Id.* (7/15/2018 email from D. Mingrone). I  
17 renewed Synopsys’ requests that Ubiquiti/UNIL agree to one of the several later dates already  
18 proposed by Judge Phillips for prior to the September 11 CMC, or, in the alternative, that it  
19 stipulate to move the CMC to October 16 in order to accommodate its own schedule. *Id.*

20 4. A true and correct copy of the parties’ email correspondence described above is  
21 attached hereto as **Exhibit C**.

22 5. Synopsys remains committed to mediating before Judge Phillips, who is the  
23 mediator selected by both parties and who is intimately familiar with the facts of the case and the  
24 parties’ positions. Synopsys believes that the parties’ best chance at settlement is to attend a  
25 further mediation session with Judge Phillips now that the parties have engaged in substantially  
26 more discovery than they had at the time of the original mediation session.

27 6. Again, Synopsys foresees no reason why extending the CMC to October 16 would  
28 affect any existing deadlines or schedules in this case.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed this 17<sup>th</sup> day of July, 2018 at Menlo Park, California.

3  
4 /s/ Denise M. Mingrone  
DENISE M. MINGRONE